

Law Office of

Douglas R. Dollinger, P.C.

& Associates, Counselors at Law

Admitted to Both

State and Federal Practice

Telephone

845.741.9363

Affiliated Offices

San Diego California
New York City New York

570 County Route 49
Middletown, New York 10940
ddollingeresq@gmail.com

December 9, 2022

United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, NY 10007
E-mail: ALCarterNYSDChambers@nysd.uscourts.gov

Re: **Tarsin et al vs. Moyer et al No: 22-9339**

Your Honor:

Service of process is being completed over the Defendant Allen Moyer. In the interim, my office has been contacted by Defendants' Attorney Edward Khouri. Mr. Khouri's Office is located at 101 Pacific Highway, in Irvine California 92618. Accordingly, Plaintiffs withdraw their Motion for Service of Process by Email.

Subject to this Court's approval our offices have agreed to stay any further action related to the Plaintiff's Motion for Injunctive Relief and will enter a stipulation concerning the relief requested in that Motion. We have also agreed to pursue a voluntary exchange of discovery documents and proceed to mediation in the next 45 days. All statutes of limitation in all states will be reserved and stayed by stipulation.

If mediation is not successful, then upon notice to the Court Counsel for the Defendants shall move for a special appearance and proceed to Answer the Complaint or move for dismissal based on lack of jurisdiction or any other viable claim.

It is respectfully requested the Court approve the foregoing for the purpose of Case Management.

Truly yours,

Douglas R. Dollinger, Esq.
Douglas R. Dollinger, Esq.

DRD/mg